



FILED IN DISTRICT COURT
OKLAHOMA COUNTY

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

APR 25 2023

Oklahoma Department of Securities
ex rel. Melanie Hall, Administrator,

Plaintiff,

v.

Premier Global Corporation et al.,

Defendants.

RICK WARREN
COURT CLERK
108

Case No. CJ-2022-5066
Judge Don Andrews

**MOTION TO EXTEND DEADLINE FOR
RECEIVER TO SUBMIT FEE RECOMMENDATIONS AND RESPOND TO MARCH
MONTHLY FEE APPLICATION**

Eric L. Johnson (the "Receiver") in his capacity as Receiver for Premier Global Corporation f/k/a Premier Construction Services, Inc., Premier Factoring, LLC, PF-2, LLC, PF-3, LLC, PF-4, LLC, PF-5, LLC, PF-6, LLC, PF-7, LLC, Premier Factoring Group, LLC, KCI Business Services, LLC, DDI Advisory Group, LLC, Steven J. Parish, and Richard Dale Dean, (collectively, the "Receivership Defendants") files this Motion for to Extend Deadline for Receiver to Submit Fee Recommendations and Respond to March Monthly Fee Application (the "Motion"). In support of his Motion, the Receiver states as follows:

1. On October 31, 2022, this Court entered an order appointing the Receiver in the present case (the "Preliminary Order"). Pursuant to the Preliminary Order, among other things, the real and personal property interests of certain of the Receivership Defendants were vested in the within receivership estate (the "Estate"). A final order (the "Final Order") appointing receiver was entered on November 21, 2021.

2. On March 14, 2023, the Court entered its Order on Defendant Richard Dale Dean and DDI Advisory Group LLC's Emergency Motions for Partial Lifting of Asset Freeze to Permit Payment of Living Expenses and for Partial Lifting of Asset Free to Permit Payment of Legal Fees (the "Unfreeze Order").

3. The Unfreeze Order established certain procedures as they related to the payment of certain legal defenses fees with respect to DDI Advisory Group, LLC and Richard Dale Dean (the "Dean Defendants") and fees beneficial to the receivership estate. The Unfreeze Order provides that the Receiver shall provide his recommendations and a proposed Order to the Court within ten (10) business days of receipt of billing statements by the Dean Defendants' counsel, Crow & Dunlevy (the "Law Firm").

4. The Law Firm sent its billing statements to the Receiver at the designated email address on April 10, 2023, so the deadline to provide the proposed Order and recommendation along with a response to the March Monthly Billing Statement is April 24, 2023 (the "Deadline").

5. Since April 10, 2023, the Receiver and various members of his team have been pulled outside of their respective offices and/or had to address deadlines and issues both in this case or others. The Receiver, however, has had the opportunity to review the billing statements as they relate to the Personal Fees and the Receivership Fees. The Receiver has informally raised several questions and concerns with the Law Firm and has made an offer to resolve both the Personal Fees and the Receiver Fees. It is the Receiver's understanding the Law Firm is considering such proposal.

6. The Receiver is requesting that the Deadline be extended to April 28, 2023 to receive a response from the Law Firm.

WHEREFORE, the Receiver requests the Court grant the Motion extending the Deadline until April 28, 2023 and grant such other and further relief as the Court deems just and proper.

Dated: April 24, 2023.

Respectfully submitted,

By: /s/ Hilary Allen

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CERTIFICATE OF SERVICE

This will certify that on the 24th day of April, 2023, a true and correct of the above and foregoing document was mailed, postage prepaid to the following:

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